LUKAS, NACE, GUTIERREZ & SACHS

1650 TYSONS BOULEVARD, SUITE 1500 MCLEAN, VIRGINIA 22102

703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS DAVID L. NACE THOMAS GUTIERREZ* ELIZABETH R. SACHS* GEORGE L. LYON, JR. PAMELA L. GIST

B. LYNN F. RATNAVALE* STEVEN M. CHERNOFF* KATHERINE PATSAS*

CONSULTING ENGINEERS ALI KUZEHKANANI

LEILA REZANAVAZ

OF COUNSEL LEONARD S. KOLSKY* JOHN CIMKO* J. K. HAGE III* JOHN J. MCAVOY* HON, GERALD S. MCGOWAN' TAMARA DAVIS-BROWN*

*NOT ADMITTED IN VA

ORIGINAL

Writer's Direct Dial (703) 584-8673 tsłamowitz@fcclaw.com

October 19, 2007

FILED/ACCEPTED

OCT 1 9 2007

Federal Communications Commission Office of the Sccretary

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re:

CC Docket 94-102

E911 Handset Penetration Quarterly Report

Northeast Communications of Wisconsin d/b/a Cellcom

Dear Ms. Dortch:

On behalf of Northeast Communications of Wisconsin d/b/a Cellcom ("Cellcom"), there is submitted herewith Cellcom's final report of the status of the carrier's progress in achieving 95% system wide penetration of location-capable handsets.

Cellcom is a Tier III that provides wireless service in parts of rural Wisconsin and Michigan. This report is submitted in compliance with the terms of the Order, CC Docket No. 94-102, FCC 05-200, released December 9, 2005, conditionally granting Cellcom an extension through December 9, 2006, of the deadline for compliance with Section 20.18(g)(1)(v) of FCC rules, 47 C.F.R. § 20.18(g)(1)(v).

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,

Enclosure

No. of Copies rec'd 09 Liet ABCDE

NORTHEAST COMMUNICATIONS OF WISCONSIN, INC D/B/A CELLCOM

E911 REPORT

NOVEMBER 1, 2007

1. The number and status of Phase II requests from Public Safety Answering Points

- Number of counties in which Cellcom provides service = 26
 - \circ Number of counties that have not requested Phase II = 1
 - Number of requests received = 25
 - Number of requests considered invalid = 0
 - Number of counties where Cellcom has implemented Phase II
 = 24
 - Number of counties with implementation date scheduled = 1

2. The dates on which Phase II service has been implemented or will be available to PSAPs served by Cellcom's wireless network

- Cellcom has already implemented Phase II service in the following eighteen counties: Brown, Calumet, Door, Fond du Lac, Forest, Kewaunee, Langlade, Lincoln, Manitowoc, Marathon, Oconto, Oneida, Outagamie, Portage, Shawano, Sheboygan, Waupaca, Waushara, Winnebago, and Wood (in the state of Wisconsin); and Delta, Dickinson, Houghton, and Marquette (in the state of Michigan).
- Cellcom is scheduled to provide Phase II service to the following counties Marinette (???). NOTE: Cellcom is currently ready to turn Phase II service on in Marinette County. The reason for the delay is that the PSAP is not ready to receive and utilize Phase II data. Marinette County has repeatedly delayed the implementation date and cannot provide a firm date for implementation. Marinette County will have to furnish a new valid request once it determines it is ready to implement Phase II service.
- Counties that have not requested Phase II service from Cellcom: Menominee (Wisconsin). Please note that Menominee has indicated it has no intention of implementing Phase II E911 service at this time.
- Cellcom is prepared to implement Phase II service within six months of receipt of a valid request from **any** county that is served by Cellcom's network. Since the county determines that date, it is impossible for Cellcom to know the estimated date for which Phase II service will be available for a specific county where Cellcom has yet to receive a request.

3. The status of coordination efforts with PSAPs for alternative 95% handset penetration dates

 On November 13, 2006, Cellcom achieved 95% handset penetration. The PSAPs were notified of Cellcom's achievement.

4. Efforts to encourage customers to upgrade to location-capable handsets

On November 13, 2006, Cellcom achieved 95% handset penetration.
 Cellcom continues to encourage customers who have not upgraded to location-capable handsets to do so.

5. The extent of subscribers located in areas with analog service

• Cellcom currently has no subscribers located in areas with analog service only. All cell sites in its network – except one – have digital capabilities. However, there are subscribers, especially those who use analog 3-watt bag phones, who receive a stronger, clearer analog signal despite the availability of a digital signal.

6. The percentage of customers with location-capable phones

• As of October 1, 2007, Cellcom is at 98.1% penetration.

7. Status in achieving compliance and whether Cellcom is on schedule to meet its revised 12/09/06 deadline

• On November 13, 2006, Cellcom achieved 95% handset penetration.